

Information Bulletin

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Title: Knowledgeable Personnel Should Not Be Substituted for Procedures

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Lessons Learned Summary: A well-written procedure is invaluable for defining and controlling a process. Procedures written to support long-term incumbent personnel with intimate knowledge of a process may not have sufficient detail to ensure the process will be performed correctly under all conditions especially when personnel changes occur.

Discussion of Activities: On July 12, 2006, Groundwater Remediation Project (GRP) shipped 14 resin totes offsite to U. S. Filters (now Siemens Water Technologies). The resin is used in ion exchange beds to extract contaminants from groundwater which is pumped through them and then returned to the ground. The shipment was made based on analytical data believed to be complete. During preparation for a September 2006 shipment, additional analytical information was discovered which had become available regarding the July shipment after the July shipment had already been made.

Analysis: A set-up factor for this event occurred due to an abrupt change of a key GRP employee. The person that left the project had a great deal of knowledge of the shipping process and associated paperwork. Waste Services employees picked up the tasks and filled in for the exiting employee. However, the procedure did not contain all of the information required to properly prepare the paperwork for a resin shipment because of the level of knowledge the previous person had of the process.

The Waste Services employees were not aware of all the steps needed to ensure that complete analytical laboratory test results had been returned. The procedure did not have a process to confirm all the requested analyses had been received for the Data Verification and/or Sample Tracking process. Additionally, there was no turnover, due to the abrupt exit of the previous employee, to aid the new people tasked with the job.

Recommendations:

- Periodically evaluate the ramifications of sudden impacts to operations, such as budget cuts, resource changes, reorganizations, and workscope changes. Understand how change can be effectively managed.
- Evaluate the adequacy of current procedures. Ensure procedures contain sufficient process steps and information to adequately control activities under all conditions. A well written procedure is invaluable for defining and controlling a process.

Cost Savings/Avoidance: Not Evaluated

Work Function: Conduct of Ops - Procedure Development

Hazards: None

Keywords: Procedure, Personnel Change

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References: Occurrence Report EM-RL-PHMC-GPP-2006-0005

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